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September 8, 2014

Judge Paul A. Engelmayer  
U.S. District Court for the Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square, Room 2201  
New York, NY 10007

**Re: Doe v. Annucci et al. (14-cv-2953)**

Dear Judge Engelmayer:

On behalf of the Plaintiffs in this action, we write pursuant to Rule 4.B of Your Honor's Individual Rules to request the issuance of an Order permitting Plaintiffs to file an unredacted copy of Plaintiffs' First Amended Complaint under seal.<sup>1</sup>

On April 30, 2014, Your Honor issued an Order permitting Plaintiffs to proceed anonymously in this case and permitting the redaction of five categories of personally-identifying and sensitive information from Plaintiffs' original Complaint and Application for a Temporary Restraining Order and Order to Show Cause for Preliminary Injunction. Specifically, Your Honor permitted Plaintiffs to redact the following five categories of information: (1) references to the Plaintiffs by their names, (2) references to Plaintiffs' personal identification information, (3) references to personal identifying information of the alleged victim in the underlying case, (4) Family Court documents, and (5) psychological evaluations.

Consistent with that Order, Plaintiffs redacted the above five categories of information from Plaintiffs' First Amended Complaint. Courtesy copies of the filing reflecting our proposed redactions have been sent to chambers for the Court's review.

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<sup>1</sup> Plaintiffs' First Amended Complaint filed electronically on Thursday, September 4, 2014 erroneously included three copies of the pleading. Earlier today, in accordance with instructions from the ECF Clerk, Plaintiffs re-filed the First Amended Complaint to address this issue only, and it is in all other respects unchanged. Our letter addressed to Quality Assurance is attached.

Judge Paul Engelmayer

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We have been informed by the Sealing Clerk that because this case is not sealed in its entirety, and because Your Honor's Order of April 30, 2014 concerned only the original filings, a new Order would need to issue from this Court to allow Plaintiffs to file the First Amended Complaint under seal.

Therefore, we request the issuance of an Order permitting Plaintiffs to file an unredacted copy of Plaintiffs' First Amended Complaint under seal, and have submitted a Proposed Order for the Court's review.

Respectfully submitted,

/s/ Sean Heikkila

Sean Heikkila

CC: Lauren Stephens-Davidowitz  
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Date: September 8, 2014

BY OVERNIGHT MAIL

USDC/SDNY  
**Quality Assurance Department**  
**Rm. 200**  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

**Re: Doe v. Annucci et al. (14-cv-2953)**

To Whom It May Concern:

Pursuant to instructions we received telephonically from a member of your staff, I am hereby requesting that document numbered 100 in the above-captioned case be marked as "Filed in Error" with a notation indicating that the error was corrected via document number 105.

The Amended Complaint filed at docket number 100 repeats itself three times in the PDF file uploaded to ECF. We believe this was an error on our part when we converted the file to PDF-A format for uploading.

Please accept my apologies for the subject error; we will be more careful in the future. If you require any additional information, please do not hesitate to reach me at 212-909-6145.

Thank you for your courtesy and cooperation.

Respectfully submitted,



Sean Heikkila

Attorney for Plaintiffs  
Debevoise & Plimpton, LLP